

Message

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**From:** Parsons, Doug [Parsons.Douglas@epa.gov]  
**Sent:** 8/23/2021 5:23:51 PM  
**To:** KARPMAN Allen [allen.karpman@arkema.com]  
**CC:** BERNSTEIN Rebecca [rebecca.bernstein@arkema.com]; Summers, Kelly [Summers.Kelly@epa.gov]; McNamara, Katelan (Katie) [McNamara.Katelan@epa.gov]  
**Subject:** RE: Risk Management under TSCA of TCE, PCE, Carbon Tetrachloride and Use in Refrigerant Manufacturing--EPA and Alliance for Responsible Atmospheric Policy

Hello Allen

Hope you are having a good summer. I am looping back on this meeting request. Want to make sure I did not miss an email. Let me know.

Thanks, doug

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**From:** KARPMAN Allen <allen.karpman@arkema.com>  
**Sent:** Monday, August 09, 2021 9:52 AM  
**To:** Parsons, Doug <Parsons.Douglas@epa.gov>  
**Cc:** BERNSTEIN Rebecca <rebecca.bernstein@arkema.com>; Summers, Kelly <Summers.Kelly@epa.gov>; McNamara, Katelan (Katie) <McNamara.Katelan@epa.gov>  
**Subject:** RE: Risk Management under TSCA of TCE, PCE, Carbon Tetrachloride and Use in Refrigerant Manufacturing--EPA and Alliance for Responsible Atmospheric Policy

Thanks very much, Doug – we will get back as soon as we can.

Best Regards,  
**Allen KARPMAN**  
+1 786 765 6134

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**From:** Parsons, Doug <Parsons.Douglas@epa.gov>  
**Sent:** Thursday, August 5, 2021 2:02 PM  
**To:** KARPMAN Allen <allen.karpman@arkema.com>  
**Cc:** BERNSTEIN Rebecca <rebecca.bernstein@arkema.com>; Summers, Kelly <Summers.Kelly@epa.gov>; McNamara, Katelan (Katie) <McNamara.Katelan@epa.gov>  
**Subject:** RE: Risk Management under TSCA of TCE, PCE, Carbon Tetrachloride and Use in Refrigerant Manufacturing--EPA and Alliance for Responsible Atmospheric Policy

Allen and Rebecca

Thank you for your patience with us. We have been trying to find open times that work for everyone. Here are some slots that work for all the offices you requested we include. Let me know which one works for you and your team. Then I will be glad to send out an invite.

doug

August 16 @ 11

August 17 @ 3

Sept 8 @ 3

Sept 9 @ 3

Sept 13 @ 11

Sept 14 @ 3

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**From:** KARPMAN Allen <[allen.karpman@arkema.com](mailto:allen.karpman@arkema.com)>

**Sent:** Tuesday, July 27, 2021 11:07 AM

**To:** Parsons, Doug <[Parsons.Douglas@epa.gov](mailto:Parsons.Douglas@epa.gov)>

**Cc:** BERNSTEIN Rebecca <[rebecca.bernstein@arkema.com](mailto:rebecca.bernstein@arkema.com)>; Wolf, Joel <[Wolf.Joel@epa.gov](mailto:Wolf.Joel@epa.gov)>; Hartman, Mark <[Hartman.Mark@epa.gov](mailto:Hartman.Mark@epa.gov)>; Winchester, Erik <[Winchester.Erik@epa.gov](mailto:Winchester.Erik@epa.gov)>

**Subject:** RE: Risk Management under TSCA of TCE, PCE, Carbon Tetrachloride and Use in Refrigerant Manufacturing--EPA and Alliance for Responsible Atmospheric Policy

Doug, thanks for the quick reply.

We agree that engagement with the New Chemicals Branch early is crucial. We anticipate that the work of the Existing Chemicals Branch on chlorinated solvents may inform the New Chemicals Branch assessment of our PMN substance. For that reason, we'd like to have an introductory discussion with both Branches to share information and discuss the impact of the AIM Act on their activities.

Best Regards,  
**Allen KARPMAN**  
+1 786 765 6134

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**From:** Parsons, Doug <[Parsons.Douglas@epa.gov](mailto:Parsons.Douglas@epa.gov)>

**Sent:** Tuesday, July 27, 2021 9:26 AM

**To:** KARPMAN Allen <[allen.karpman@arkema.com](mailto:allen.karpman@arkema.com)>

**Cc:** BERNSTEIN Rebecca <[rebecca.bernstein@arkema.com](mailto:rebecca.bernstein@arkema.com)>; Wolf, Joel <[Wolf.Joel@epa.gov](mailto:Wolf.Joel@epa.gov)>; Hartman, Mark <[Hartman.Mark@epa.gov](mailto:Hartman.Mark@epa.gov)>; Winchester, Erik <[Winchester.Erik@epa.gov](mailto:Winchester.Erik@epa.gov)>

**Subject:** RE: Risk Management under TSCA of TCE, PCE, Carbon Tetrachloride and Use in Refrigerant Manufacturing--EPA and Alliance for Responsible Atmospheric Policy

Hello Allen

We have a quick question. Have you started engaging the people in the New Chemicals Division here at EPA regarding the PMN? I think the general advice is to engage with the new chemicals team early in the process.

Thanks, doug

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**From:** KARPMAN Allen <[allen.karpman@arkema.com](mailto:allen.karpman@arkema.com)>

**Sent:** Monday, July 26, 2021 1:58 PM

**To:** Parsons, Doug <[Parsons.Douglas@epa.gov](mailto:Parsons.Douglas@epa.gov)>

**Cc:** BERNSTEIN Rebecca <[rebecca.bernstein@arkema.com](mailto:rebecca.bernstein@arkema.com)>; Wolf, Joel <[Wolf.Joel@epa.gov](mailto:Wolf.Joel@epa.gov)>; Hartman, Mark <[Hartman.Mark@epa.gov](mailto:Hartman.Mark@epa.gov)>; Winchester, Erik <[Winchester.Erik@epa.gov](mailto:Winchester.Erik@epa.gov)>

**Subject:** RE: Risk Management under TSCA of TCE, PCE, Carbon Tetrachloride and Use in Refrigerant Manufacturing--EPA and Alliance for Responsible Atmospheric Policy

Dear Doug,

Following up on our virtual meeting with the Alliance for Responsible Atmospheric Policy, Arkema would like to meet with EPA to discuss our use of chlorinated feedstocks for the manufacture of fluorogases and the anticipated impact of the AIM Act on our activities.

We currently use DCM and TCE, and submitted a substantial quantity of use and exposure information to the Agency during the Risk Evaluation process. We have also announced plans to manufacture a HFO at our Calvert City, KY plant, for which we plan to use a chemical not currently on the TSCA inventory.

We therefore request that the meeting include someone from the New Chemicals branch (our EHS person suggested Madison Lee) and someone from the Air Office (Ozone Protection – Cindy Newberg's team).

Please give us a few options in the first half of September to have the right team(s) available.

Best Regards,



**Allen KARPMAN**

Director, Government Affairs, Fluorochemicals Americas

[allen.karpman@arkema.com](mailto:allen.karpman@arkema.com)

+1 610 205 7077 office, +1 786 765 6134 mobile

-----Original Appointment-----

**From:** Parsons, Doug <[Parsons.Douglas@epa.gov](mailto:Parsons.Douglas@epa.gov)>

**Sent:** Wednesday, June 30, 2021 1:38 PM

**To:** Parsons, Doug; Wolf, Joel; Kramek, Niva; Summers, Kelly; Ellenbogen, Victoria; Lloyd, Tyler; Monroe, Albert; Brisse, Claire; Shuman, Amy; Blake-Hedges, Lynne; McNamara, Katelan (Katie); Rice, Cody; Brown, Judith; Menasche, Claudia; Catilina, Eliane; Hartman, Mark; Winchester, Erik; Courtnage, Robert; Corado, Ana; Blair, Susanna; Grant Mckenzie; [fay@alcalde-fay.com](mailto:fay@alcalde-fay.com); Callahan, Leigh

**Cc:** KARPMAN Allen; [mbeatty@refrigerants.com](mailto:mbeatty@refrigerants.com); [caffey.norman@squirepb.com](mailto:caffey.norman@squirepb.com); [dave.stirpe@kouraglobal.com](mailto:dave.stirpe@kouraglobal.com); [BColeman@hudsonstech.com](mailto:BColeman@hudsonstech.com); O'Haire, Chloe; MURPHY-EXT Sandi; Jim Hathcock; Mackenzie Dobson; Welbourn, Brandon; Rossner, Gabriela; Leszczyszyn, Natalia

**Subject:** Risk Management under TSCA of TCE, PCE, Carbon Tetrachloride and Use in Refrigerant Manufacturing--EPA and Alliance for Responsible Atmospheric Policy

**When:** Thursday, July 15, 2021 2:00 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).

**Where:** Microsoft Teams Meeting

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